

National Park Service Hazardous Waste Management & Pollution Prevention Team Washington DC 20240 (202)565-1240(x3)

HAZARD COMMUNICATION (HAZCOM)

DEFINITIONS

Employer: A person engaged in a business where chemicals are either used, distributed, or are produced for use or distribution, including a contractor or subcontractor.

APPLICABLE STANDARDS

Federal: Administered by the Occupational Safety and Health Administration (OSHA) 29 CFR 1910.1200 on hazard communication (HAZCOM) requires that all employers (regardless of size) who use hazardous chemicals make manufacturer's hazard data on these products available to personnel and customers and provide labels, warnings, and training to employees about how to use the information provided to avoid potential hazards.

State: If the OSHA program is administered by the state, there could be additional requirements beyond those cited in 29 CFR 1910.1200.

HAZARD EVALUATION

Chemical manufacturers and importers are required to review available scientific evidence concerning the hazards of the chemicals they produce or import, and to report their findings to their personnel as well as to employers (e.g., parks) who distribute or use their products. Each chemical must be evaluated for its potential to cause adverse health effects and its potential to pose physical hazards, such as fire or explosion. This information is usually provided in a Material Safety Data Sheet (MSDS).

HAZARD COMMUNICATION PROGRAM

Parks must develop and implement a <u>written</u> hazard communication (HAZCOM) plan that addresses the following elements:

- Container labeling and other warnings.
- Collection and availability of MSDSs.
- List of hazardous chemicals in each work
 area
- Personnel training.
- Personal protective equipment.

The written plan should also describe the methods a park will use to assess and communicate the hazards to personnel posed by non-routine activities.

LABELS AND WARNINGS

Chemical manufacturers, importers, and distributors must label chemical containers with the identity and appropriate hazard warnings, as well



as the name and address of the manufacturer.

Parks must label each container (or groups of containers) in the workplace with the identity of the contents and hazard warnings appropriate for employee protection. Parks do not have to label portable containers used to transfer materials from, and to, a labeled container.

HAZCOM does <u>not</u> require pipes or piping systems to be labeled. HAZCOM does require parks to discuss hazards posed by unlabeled piping systems. In addition, it is good practice to label all pipes conveying hazardous materials even if other regulations or codes do not require it.

MATERIAL SAFETY DATA SHEETS

MSDSs for chemicals found in a particular area must be readily accessible to personnel at all times. The written HAZCOM plan should address how MSDS files will be kept and how they will be made accessible to personnel.

MSDSs for materials no longer present at the park should be discarded.

INVENTORY OF HAZARDOUS CHEMICALS

Parks must prepare a list of all hazardous chemicals in the workplace. When the list is complete, it should be checked against the MSDSs the park has collected. If there are chemicals used for which there is no MSDS at the park, the park must write to the

manufacturer, supplier, or importer and obtain the missing MSDS. The MSDS inventory should be periodically updated to reflect the most current listing of materials on-hand. The inventory of hazardous chemicals should include: the manufacturer's name, address, and phone number, the product/chemical name, the quantity of each specific product/chemical sorted by location, the physical state of the product/chemical (solid, liquid, or gas), lastly an indication of whether a MSDS is available on file.

TRAINING

HAZCOM training must consist of the following elements:

- How to read and understand information on labels and the MSDS.
- How personnel can obtain and use the available hazard information.
- The hazards of the chemicals (and their uses) in each work area. The hazards may be discussed by individual chemical or by categories, such as flammability.
- Measures personnel can take to protect themselves from the hazards.
- Procedures put in place by the park to provide protection (i.e., work practices, protective equipment, or controls).
- Methods by which personnel can detect the presence of a hazardous chemical to which they may be exposed.
- What to do in an emergency involving the chemicals, such as a spill or fire.

It is good practice for parks to keep records of training dates, personnel trained, and how competency was determined (i.e., testing).

Personnel should be trained when beginning work in an area with chemical hazards and retrained periodically (i.e., annual refresher training).

ENVIROFACTS X-REFERENCES

- Environmental Training
- Emergency Response
- Respiratory Protection

HAZARD COMMUNICATION CHECKLIST

	Checklist Item	Notes
1.	Ensure that all hazardous chemicals or products used at your park have been inventoried and listed and that inventory is up-to-date.	
2.	Verify that your chemical list has been compared with the MSDSs you have available. Make sure that any missing MSDSs are obtained.	
3.	Make sure that the MSDS "binder" is up-to-date and that obsolete MSDSs have been discarded.	
4.	Ensure that MSDSs are available to personnel in the area(s) where the products are used.	
5.	Confirm that all containers are labeled and appropriate warnings are posted.	
6.	Verify that a written hazard communication plan has been developed.	
7.	Ensure that new employees or those that switch jobs are trained about how to obtain and use hazard information. Confirm that training records are maintained.	
8.	Verify that annual refresher training is conducted for all personnel working with hazardous chemicals.	